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April 4, 2011

VIA CM/ECF AND FEDEX

The Hon. Garrett E. Brown, Jr., U.S.D.J.
United States District Court
District of New Jersey
Clarkson S. Fisher Federal Building
and U.S. Courthouse
402 East State Street, Room 4050
Trenton, NJ 08608

Re: Illinois National Insurance Co. v. Wyndham Worldwide Operations, Inc., et al.
Civil Action No. 09-1724

Dear Judge Brown:

This firm represents Defendants Wyndham Worldwide Operations, Inc., Wyndham Worldwide Corporation, Wyndham Vacation Ownership, Inc., and Wyndham Resort Development Corporation (collectively, "Wyndham") in the referenced action. We respectfully submit this letter and the enclosures in furtherance of Your Honor's March 21, 2011 Order granting Wyndham's motion for attorneys' fees and expenses under New Jersey Court Rule 4:42-9(a)(6). We note that Your Honor's Order only calls for the parties to provide evidence to the Court regarding a "reasonable market rate."

Enclosed please find the declarations of the following three New Jersey attorneys who, like Lowenstein Sandler PC ("Lowenstein"), represent sophisticated policyholders in large insurance coverage disputes similar to the instant litigation: Kevin J. Bruno, Esq. of Blank Rome LLP; Jeffrey M. Pollock, Esq. of Fox Rothschild LLP; and Steven J. Pudell, Esq. of Anderson Kill & Olick. Each of these attorneys has reviewed the rates for Lowenstein timekeepers in this case and has concluded that they are reasonable, and in some instances lower than the rates charged by their firm. Also included with this submission for Your Honor's convenience, is the Declaration of Sherilyn Pastor, Esq. originally filed on October 12, 2010 [Doc. No. 103-1] attesting to the reasonableness of Lowenstein's rates and distinguishing between law firms, like Lowenstein, which represent sophisticated insureds and firms that primarily represent insurance carriers (such as Wyndham's prior counsel, Coughlin Duffy), whose rates are typically much lower in exchange for higher volume work. Also enclosed is the supplemental Declaration of Michael David Lichtenstein, Esq. noting that the blended, average rate of the Lowenstein attorneys on this matter is \$338.80.

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We also respectfully refer Your Honor to the following declarations submitted in connection with the original briefing on the motion: (1) Declaration of Christopher S. Porrino, Esq. filed on October 12, 2010 [Doc. No. 103-2], which notes that Lowenstein discounted its billing rates in this matter between 7.62 and 9.6 percent, depending on the timekeeper; (2) Declaration of Michael David Lichtenstein, Esq. filed on September 22, 2010 [Doc. No. 99-2], which attests to the billing rates of Lowenstein timekeepers in this case; and (3) Declaration of Marcus A. Banks, Esq. filed on October 12, 2010 [Doc. No. 103-7] stating the reasons Wyndham retained Lowenstein.

Respectfully submitted,



Michael David Lichtenstein

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Enclosures

cc: Andrew T. Houghton, Esq. (via ECF and FedEx)